

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

=====X
TARIQ WILLIAMS,

SUMMONS

Plaintiff,

-against-

SAMEK TRUCKING,
MICHAEL SAMEK and
ERIC YOUNG,

Defendants.
=====X

Plaintiff designates New York County as the place of trial based on the location of the accident.

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance on the Plaintiff's Attorneys within 20 days after the service of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York). In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: Garden City, New York
September 27, 2021



Paul Ajlouny & Associates, P.C.
By: Paul Ajlouny, Esq.
320 Old Country Road, Suite 205
Garden City, New York 11530
P: (516) 535-5555

Defendants' Addresses:

SAMEK TRUCKING
85 Bethany Road, Unit 4
Monson, MA

ERIC YOUNG
100 ½ North Street
Ware MA 01082-1030

MICHAEL SAMEK
85 Bethany Road, Unit 4
Monson, MA

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

=====X
TARIQ WILLIAMS,

Plaintiff,

VERIFIED COMPLAINT

-against-

SAMEK TRUCKING,
MICHAEL SAMEK and
ERIC YOUNG,

Defendants.

=====X

Plaintiff alleges the following, upon information and belief:

1. The accident occurred in the County of New York, State of New York.
2. That at all the times hereinafter alleged, Defendant, SAMEK TRUCKING, was a domestic business corporation licensed to do business in the State of New York.
3. That at all the times hereinafter alleged, Defendant, SAMEK TRUCKING, was a foreign business corporation licensed to do business in the State of New York.
4. That at all the times hereinafter alleged, and upon information and belief, Defendant, SAMEK TRUCKING, conducted and carried on business in the State of New York.
5. That at all the times hereinafter alleged, and upon information and belief, Defendant, SAMEK TRUCKING, transacted business within the State of New York.
6. That at all the times hereinafter alleged, and upon information and belief, Defendant, SAMEK TRUCKING, derived substantial revenue from goods used or consumed or services rendered in the State of New York.

7. That at all the times hereinafter alleged, and upon information and belief, the Defendant, SAMEK TRUCKING, expected or should have reasonably expected its acts to have consequences in the State of New York.

8. That at all the times hereinafter alleged, Defendant, SAMEK TRUCKING, owned a motor vehicle bearing Massachusetts plate number 5846A, or similar number ("Vehicle 1").

9. That at all the times hereinafter alleged, Defendant, SAMEK TRUCKING, was the lessee of Vehicle 1.

10. That at all the times hereinafter alleged, Defendant, SAMEK TRUCKING, was the lessor of Vehicle 1.

11. That at all the times hereinafter alleged, Defendant, MICHAEL SAMEK, owned Vehicle 1.

12. That at all the times hereinafter alleged, Defendant, MICHAEL SAMEK, was the lessee of Vehicle 1.

13. That at all the times hereinafter alleged, Defendant, MICHAEL SAMEK, was the lessor of Vehicle 1.

14. That at all the times hereinafter alleged, Defendant, MICHAEL SAMEK, operated Vehicle 1 with the permission and consent of its owner.

15. That at all the times hereinafter alleged, Defendant, MICHAEL SAMEK, was employed by Defendant, SAMEK TRUCKING.

16. That at all the times hereinafter alleged, Defendant, MICHAEL SAMEK, operated Vehicle 1 within the course of the aforementioned employment.

17. That at all the times hereinafter alleged, Defendant, ERIC YOUNG, operated Vehicle 1 with the permission and consent of its owner.

18. That at all the times hereinafter alleged, Defendant, ERIC YOUNG, was employed by Defendant, SAMEK TRUCKING.

19. That at all the times hereinafter alleged, Defendant, ERIC YOUNG, operated Vehicle 1 within the course of the aforementioned employment.

20. That at all the times hereinafter alleged, Plaintiff operated a motor vehicle bearing New York plate number T525588C, or similar number ("Vehicle 2").

21. That at all the times hereinafter alleged, 95 North (Cross Bronx Expressway) / 87 Major Deegan, at or near the Yankee Stadium exit, in the County and State of New York, was a public roadway.

22. On or about February 20, 2020, at or near the aforementioned place, the aforementioned motor vehicles came into contact with each other.

23. At or about the aforesaid place, Vehicle 1 struck Vehicle 2 in the rear

24. That at all the times hereinafter alleged, Defendants were negligent with regard to the ownership and operation of their aforementioned vehicle.

25. Solely by reason of the aforementioned negligence, Plaintiff sustained a serious injury and/or economic loss greater than the basic economic loss as defined by the New York Insurance Law.

26. This action falls within one or more of the exceptions contained in Article 16 of the CPLR.

27. Plaintiff's damages exceed the jurisdictional limits of all lower courts.

WHEREFORE, Plaintiff demands judgment in an amount to be determined at trial with costs and disbursements.

Dated: Garden City, New York
September 27, 2021



Paul Ajlouny & Associates, P.C.

By: Paul Ajlouny, Esq.

320 Old Country Road, Suite 205

Garden City, New York 11530

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ATTORNEY'S VERIFICATION

I have read the annexed Summons and Complaint and know the contents thereof, and the same are true to my knowledge, except for those matters therein stated upon information and belief, and as to those matters, I believe them to be true. The reason I make this verification instead of the Plaintiff herein is that said Plaintiff does not reside in the County where I maintain my office.

Dated: Garden City, New York
September 27, 2021



Paul Ajlouny, Esq.